

JAP:VR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-09-613

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18 U.S.C. § 1546)

SUKHVINDER SINGH GHOTRA and
GURMIT KAUR,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

NORMAN RAMIREZ-SEDA, being duly sworn, deposes and states that he is a Special Agent with the United States Department of State, duly appointed according to law and acting as such.

Upon information and belief, on or about June 22, 2009, within the Eastern District of New York, the defendants SUKHVINDER SINGH GHOTRA and GURMIT KAUR, did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546)

The source of your deponent's information and the grounds for this belief are as follows:¹

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.

1. My information comes from a joint investigation of the United States Department of State and the United States Customs and Border Protection agency.

2. On or about June 22, 2009, the defendants SUKHVINDER SINGH GHOTRA and GURMIT KAUR arrived at John F. Kennedy International Airport in Queens, New York, aboard Air India Flight No. 101 from New Delhi, India. Upon arrival, defendant GHOTRA presented an Indian passport # G9458591, issued on July 15, 2008, with a 1974 year of birth and a birthplace of Hoshiarpur, India ("Passport 1") to a CBP officer. Passport 1 contained a B1/B2 visa, Visa Foil No. 59160462 (Control No. 20091538800001), issued by the United States Department of State Bureau of Consular Affairs on June 2, 2009. Defendant KAUR presented an Indian passport # G4828059, issued on September 20, 2007, with a 1978 year of birth and a birthplace of Hoshiarpur, India ("Passport 2") to a CBP officer. Passport 2 contained a B1/B2 visa, Visa Foil No. 59166567 (Control No. 20091538800002), issued by the United States Department of State Bureau of Consular Affairs on June 17, 2009.


3. After presenting their passports, the defendants SUKHVINDER SINGH GHOTRA and GURMIT KAUR were selected for a secondary inspection by CBP officers.

4. During secondary inspection, both defendant GHOTRA and defendant KAUR told CBP officers that they were visiting the United States for approximately two months and that they would be

staying with defendant KAUR's sister and brother-in-law in New York. However, neither defendant GHOTRA nor defendant KAUR was able to provide CBP officers with an address or a phone number for the relatives with whom they were to be staying.

5. Upon further questioning, both defendant GHOTRA and defendant KAUR admitted, in sum and in part, that they paid 14 lakhs Indian rupees to purchase fraudulent documents, including fraudulent employment papers, land deeds, sponsorship paperwork, and bank and credit card statements, to submit in support of their visa applications. Defendant GHOTRA also admitted that he intended to remain in the United States and seek permanent employment.

WHEREFORE, your deponent respectfully requests that the the defendants SUKHVINDER SINGH GHOTRA and GURMIT KAUR be dealt with according to law.


NORMAN RAMIREZ-SEDA
Special Agent
U.S. Department of State

Sworn to me on this
23rd day of June, 2009

THE
UNIT
EAST

S/Orenstein

ISTEIN
JUDGE
YORK